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**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS COUNTY
DEPARTMENT, LAW DIVISION**

THOMAS ANDERSON, JAMES
BREITSPRECHER, LORA BAUER,
KEVIN CAMPBELL, DAVID
CATALA, JAMES CURTIS,
NICHOLAS DECKER, AIMEE
DOLL, TOM FLOYD, KEVIN
HENDERSHOT, THAD KRUPA,
KENNETH LOCKE, BRENDA
MALLET, BRENDA MARSDEN,
SYLVIA FITCH-MCCONNELL,
MICHELE MILLER, JOHN
MORRIS, CAROLE O'KOBRIK,
STEPHANIE PATI, FRANK
QUINTAS, PAUL ROZELL,
DARLEEN SHANLEY-GILBERT,
RICHARD SHERLOCK, RANDY
SIKORA, CHARLES SNYDER,
JOHN SULLIVAN, DOUG TURNER,
RHETT WOLFF, JAMES ZIETLOW,
KEVIN ZWIERKO, individuals,

Plaintiffs,

v.

UNITED AIRLINES INC., a
Delaware corporation, and SCOTT
KIRBY, BRETT J. HART, KATE
GEBE, JOSH EARNST, GREGORY
HART, LINDA JOJO, GERALD
LADERMAN, ANDREW NOCELLA,
JANET LAMKIN, JONATHAN M.
ROITMAN, JOHN SLATER,
TORBJORN J. ENQVIST, THERESA
FARIELLO, SASHA JOHNSON,
BRYAN QUIGLEY, KIRK
LIMACHER, EDWARD M. PHILIP,
CAROLYN CORVI, MATTHEW
FRIEND, MICHAEL J.
HAMILTON, MICHAEL HARRISON,

Cause No.

**COMPLAINT AND DEMAND FOR
JURY TRIAL**

COMPLAINT AND DEMAND FOR JURY TRIAL

BARNEY HARFORD, MICHELE J.
HOOPER, TODD M. INSLER,
WALTER ISAACSON, RICHARD
JOHNSEN, JAMES A.C. KENNEDY,
EDWARD L. SHAPIRO, DAVID J.
VITALE, JAMES M. WHITEHURST,
LAYSHA WARD, individuals,

Defendants.

NATURE OF THE CASE

1. Plaintiffs are unvaccinated¹ pilots, flight attendants, ramp service workers, mechanics, technicians, customer service representatives (CSRs) and other ground staff of United Airlines, Inc. ("United") who have been fired, placed on unpaid leave, or otherwise had their careers at United limited or terminated without just compensation. Plaintiffs have all submitted, or attempted to submit requests for religious accommodations that would have allowed them to continue working at United without receiving coronavirus vaccinations, and all Plaintiffs have natural immunity from the disease.

2. This is an action for legal and equitable relief to redress Defendants' invasions of privacy, negligence, failure to accommodate, religious discrimination, creation of a hostile work environment, violations of the Genetic Information Non-Disclosure Act ("GINA") and otherwise wrongful conduct that was perpetrated, encouraged, and condoned by Defendants. Such wrongful conduct was predicated on Defendants' unlawful discrimination, harassment, and retaliation against Plaintiffs based on their requests for religious accommodations from Defendants' coronavirus vaccine mandate.

¹ Some plaintiffs may have been coerced into taking one or more COVID-19 vaccine injections. But all plaintiffs are considered unvaccinated by United, and all plaintiffs have suffered and continue to suffer the harms described in this complaint.

3. Specifically, this lawsuit is grounded in Defendants' willful, wanton, and blatant disregard of Plaintiffs requests for religious accommodations from Defendants' execution of the novel coronavirus vaccine mandate and subsequent termination on discriminatory grounds. Such a willful disregard of this magnitude flies in the face of one of our countries founding freedoms; the freedom of religion.

4. This lawsuit also seeks declaratory relief from the Defendants' vaccine mandate on the basis that Defendants' conduct was indistinguishable from that of a state actor and Defendants' vaccine mandate, as applied, violates privacy, equal protection and due process protections secured by both the Constitution of Illinois and the Constitution of the United States.

5. Defendants used deception, discrimination, psychological manipulation, and physical isolation to force Plaintiffs, under threat of termination, to participate in a dangerous social and medical experiment.

6. Defendants, have made Plaintiffs second-class citizens within the company and targeted them in a campaign of harassment designed to force plaintiffs to submit to an injection of an unknown, experimental substance of questionable efficacy. Defendants' vaccine mandate was illegally constituted, lacked a learned intermediary, and it engendered a hostile working environment for Plaintiffs. Defendants' actions and workplace toxicity forced Plaintiffs into an impossible decision they never wanted to make; take an experimental gene-based therapy at the expense of their religious beliefs and/or health or lose their livelihoods and the means by which they provide for their families.

7. In some cases, Defendants wrongfully terminated Plaintiffs who correctly requested religious accommodations. In other cases, Defendants placed Plaintiffs who correctly filed for religious exemptions on indefinite unpaid leave (termination in place) with an ever-present possibility of termination and characterized this as a 'reasonable accommodation'. In other cases, Defendants granted Plaintiffs religious 'accommodation' and immediately proceeded to create a hostile work environment by forcing Plaintiffs to wear individually identifiable

symbols distinguishing them from their peers and gave public disclosure of their private and protected health information.

8. Even after Defendants allowed some Plaintiffs to return to work, a toxic and hostile work environment, where isolation, open discrimination, and the enforced use of individually identifiable political symbols remained.

9. Defendants also violated the rule of informed consent, by coercing Plaintiffs to submit to the vaccine without any information on the potential risks or benefits. Several Plaintiffs (and other United employees) have suffered adverse side-effects and harm as a result of submitting to the vaccine. In addition to actual physical harm, Plaintiffs now face emotional distress as they worry about possible long-term side effects.

10. These risks may even extend to Defendants' customers if pilots who submitted to Defendant pressure to take the vaccines suffer health effects while flying.²

11. A number of Plaintiffs were constructively discharged and took early retirement to escape the hostile work environment during this period. This suit is further brought to redress the harms Defendants have dispassionately brought upon their own employees after years of loyal service, to make them whole, and to help ensure the principles of medical freedom through informed consent are preserved.

PARTIES

12. Plaintiff, Thomas Anderson is an individual and employee or former employee of United.

13. Plaintiff, James Breitsprecher is an individual and former employee of United for 22 years, working as a 777 First Officer. He was twice furloughed by United. He applied for a religious exemption, but it was denied and he was

² See, Hoft, Jim. "Pilot dies suddenly after collapsing shortly after takeoff from Chicago airport," *Gateway Pundit*. November 22, 2022 (detailing sudden death of a vaccinated pilot for another airline while in flight; only the skill of a copilot saved the lives of dozens of passengers).

subsequently terminated for choosing not to submit to COVID-19 vaccine. He also served as United States Navy SEAL for 9 years.

14. Plaintiff, Lora Bauer is an individual and employee or former employee of United.

15. Plaintiff, Kevin Campbell is an individual and former employee of United for 37 years, working as an aircraft technician/inspector. He was granted a religious exemption but was terminated shortly thereafter due to "non-compliance."

16. Plaintiff, David Catala is an individual and employee or former employee of United.

17. Plaintiff, James Curtis is an individual and employee or former employee of United.

18. Plaintiff, Nicholas Decker is an individual and employee or former employee of United.

19. Plaintiff, Aimee Doll is an individual and employee or former employee of United.

20. Plaintiff, Tom Floyd is an individual and employee or former employee of United.

21. Plaintiff, Kevin Hendershot is an individual and employee or former employee of United.

22. Plaintiff, Thad Krupa is an individual and employee or former employee of United.

23. Plaintiff, Kenneth Locke is an individual and employee or former employee of United.

24. Plaintiff, Brenda Mallett is an individual and employee or former employee of United.

25. Plaintiff, Brenda Marsden is an individual and employee or former employee of United.

26. Plaintiff, Sylvia Fitch-McConnell is an individual and employee or former employee of United.

27. Plaintiff, Michelle Miller is an individual and employee or former employee of United.

28. Plaintiff, John Morris is an individual and employee or former employee of United.

29. Plaintiff, Carole O'Kobrick is an individual and employee or former employee of United.

30. Plaintiff, Stephanie Pati is an individual and employee or former employee of United.

31. Plaintiff, Frank Quintas is an individual and employee or former employee of United.

32. Plaintiff, Paul Rozell is an individual and former employee of United for 27 years, working as a ramp services agent. He made multiple attempts to apply for a religious exemption, but he purportedly missed United's arbitrarily imposed deadline. He was terminated for choosing not to submit to a COVID-19 vaccine.

33. Plaintiff, Darleen Shanley-Gilbert is an individual and employee or former employee of United.

34. Plaintiff, Richard Sherlock is an individual and employee or former employee of United.

35. Plaintiff, Randy Sikora is an individual and employee or former employee of United.

36. Plaintiff, Charles Snyder is an individual and employee or former employee of United.

37. Plaintiff, John Sullivan is an individual and employee or former employee of United.

38. Plaintiff, Doug Turner is an individual and employee or former employee of United.

39. Plaintiff, Rhett Wolff is an individual and employee or former employee of United.

40. Plaintiff, James Zietlow is an individual and employee or former employee of United.

COMPLAINT AND DEMAND FOR JURY TRIAL

41. Plaintiff, Kevin Zwierko is an individual and employee or former employee of United.

42. Defendant, United Airlines, Inc. ("United") is a corporation formed under the laws of the State of Delaware with its principal place of business located in Chicago, Illinois. United is a major American airline that operates a large domestic and international route network with a fleet of roughly 834 aircraft and approximately 67,000 employees.

43. Defendant, Scott Kirby is an individual and Chief Executive Officer of United.

44. Defendant, Brett J. Hart is an individual and President of United.

45. Defendant, Kate Gebo is an individual and Executive Vice President for Human Resources and Labor Relations at United.

46. Defendant, John Slater is an individual and Senior Vice President of Inflight at United.

47. Defendant, Josh Earnst, is an individual and Senior Vice President and Chief Communications Officer at United.

48. Defendant, Gregory (Greg) Hart is an individual and Executive Vice President at United.

49. Defendant, Linda JoJo is an individual and Executive Vice President and Chief Customer Officer at United.

50. Defendant, Gerald (Gerry) Laderman is an individual and Executive Vice President and Chief Financial Officer at United.

51. Defendant, Andrew Nocella is an individual and Executive Vice President and Chief Commercial Officer at United.

52. Defendant, Janet Lamkin is an individual and Senior Vice President for Market and Community Innovation at United.

53. Defendant, Jonathan M. Roitman is an individual and departed Executive Vice President and Chief Operating Officer at United.

54. Defendant Torbjorn (Toby) J. Enqvist is an individual and Executive Vice President and Chief Operations Officer at United.

COMPLAINT AND DEMAND FOR JURY TRIAL

55. Defendant Theresa (Terry) Fariello is an individual and Senior Vice President, Government Affairs and Global Public Policy at United.

56. Defendant, Sasha Johnson is an individual and Vice President of Corporate Safety at United.

57. Defendant, Bryan Quigley is an individual and Senior Vice President of Flight Operations at United.

58. Defendant, Kirk Limacher is an individual and the Vice President of Human Resources at United.

59. Defendant, Edward M. Philip is an individual and Board Member of United.

60. Defendant, Carolyn Corvi is an individual and Board Member of United.

61. Defendant, Matthew Friend is an individual and Board Member of United.

62. Defendant, Michael J. Hamilton is an individual and a departed Board Member of United.

63. Defendant, Michael Harrison is an individual and acting Board Member of United.

64. Defendant, Barney Harford is an individual and Board Member of United.

65. Defendant, Michele J. Hooper is an individual and Board Member of United.

66. Defendant, Todd M. Insler is an individual and departed Board Member of United.

67. Defendant, Walter Isaacson is an individual and Board Member of United.

68. Defendant, Richard Johnsen is an individual and Board Member of United.

69. Defendant, James A.C. Kennedy is an individual and Board Member of United.

70. Defendant, Edward L. Shapiro is an individual and Board Member of United.

71. Defendant, David J. Vitale is an individual and departed Board Member of United.

72. Defendant, James M. Whitehurst is an individual and Board Member of United.

73. Defendant, Laysha Ward is an individual and Board Member of United.

MISNOMER/ ALTER EGO

74. In the event any parties are misnamed or are not included herein, it is Plaintiffs' contention that such was a "misidentification", "misnomer," and/or such parties are/were "alter egos" of parties named herein. Alternatively, Plaintiffs contend that any "corporate veils" should be pierced to hold such parties properly included in the interest of justice.

JURISDICTION AND VENUE

75. This Court has subject matter jurisdiction over this case pursuant to S.H.A. Art. 6, § 9 of the Illinois Constitution, which states: "Circuit Courts shall have original jurisdiction of all justiciable matters except when the Supreme Court has original and exclusive jurisdiction."³

76. This Court has personal jurisdiction over Defendants through domicile of the corporation because, pursuant to 2-209(b) of the Illinois Code of Civil Procedure, a Defendant who is either "physically present in Illinois, or who

³ See, *Belleville Toyota, Inc. v. Toyota Motor Sales, U.S.A., Inc.*, 199 Ill. 2d 325, 334, 770 N.E.2d 177, 184 (2002) ("With the exception of the circuit court's power to review administrative action, which is conferred by statute, a circuit court's subject matter jurisdiction is conferred entirely by our state constitution.").

consents to defend a lawsuit in Illinois, is subject to personal jurisdiction under the common law of Illinois.”⁴ Personal and subject matter jurisdiction further exist under Illinois’ long-arm statute as codified in section 2-209(a) of the Illinois civil code. Defendants and their agents engaged in business in the state and engaged in the commission of a tortious act within the state and other enumerated acts described in this complaint.

77. Venue is proper in this Circuit Court pursuant to 735 ILCS 5/2-103.⁵ and Code section 5/2-101 where, as a general rule, a “plaintiff may file a civil action in any county where (1) any defendant joined in good faith resides, or (2) any part of the transaction giving rise to the cause of action occurred.” Since United, including its affiliates and leadership, do a high percentage of their business and is headquartered in Illinois, venue is proper in Illinois.⁶

BACKGROUND

A. The COVID-19 Pandemic and Vaccine Response

78. The United States (“U.S.”) government responded to a public health emergency of respiratory diseases caused by a novel coronavirus named “severe acute respiratory syndrome coronavirus (SARS-COV-2), commonly known as (“COVID-19”), that has been detected in over 190 countries internationally, all 50 states, the District of Columbia, and all U.S. territories.

79. On January 30, 2020, the International Health Regulations Emergency Committee of the World Health Organization (“WHO”) declared the outbreak a “Public Health Emergency of International Concern.”

⁴ See, 735 Ill. Comp. Stat. Ann. 5/2-209.

⁵ See, Michael, 3 Illinois Practice: Civil Procedure Before Trial §§ 2.1 to 14.6.

⁶ See, *People ex rel. Madigan v. Leavell*, 388 Ill. App. 3d 283, 329 Ill. Dec. 11, 905 N.E.2d 849 (4th Dist. 2009). See also, *Long v. Gray*, 306 Ill. App. 3d 445, 239 Ill. Dec. 744, 714 N.E.2d 1041 (1st Dist. 1999).

80. Three (3) separate COVID-19 vaccines have been developed and used in the U.S. The manufacturers are Moderna, Pfizer-BioNTech, and Johnson & Johnson. None of the products are vaccines in the traditional meaning of the word. Vaccines developed to eliminate diseases like polio, smallpox and the measles provide individuals with immunity from contracting the particular condition. These products do not provide individuals with immunity from contracting COVID-19. Instead, they are promoted on the grounds that they provide a “level of protection against contracting COVID-19” or that they may provide a level of protection against the “effects of COVID-19.” Nevertheless, these medical products are commonly given the misnomer “vaccine.”

81. Traditional vaccines contain whole or part of a harmless bacteria or virus that is sought to provide inoculation by speeding up a process that occurs naturally. These traditional vaccines allow one’s cells to ‘learn’ how to defend against the viral agent without suffering the consequence of a ‘live’ virus. In contrast, all three COVID-19 vaccines utilize never-before tested on humans technology which constitutes “gene therapy.” Two vaccines contain messenger ribonucleic acid (“mRNA”), inserted into the cell nucleus, which serve as instructions or a recipe for the creation of a spike protein that triggers an immune response; they are synthetic surrogates of the body’s genetic information. Johnson & Johnson’s medical product uses a different platform but retains same type of gene therapy end result.

82. The Food and Drug Administration (“FDA”) issued an Emergency Use Authorization (“EUA”) for the medical product manufactured by Pfizer-BioNTech on December 11, 2020. One week later, the FDA issued an EUA for the Moderna

COVID-19 medical product. Finally, the FDA issued an EUA for the Johnson & Johnson COVID-19 medical product on February 27, 2021.⁷

83. An EUA is not synonymous with FDA approval. Instead, an EUA is an administrative mechanism that allows the use of an ‘unapproved’ medical product. An EUA may be granted by the FDA to (among other reasons) facilitate medical countermeasures against the spread of infectious diseases. EUA’s may be terminated or revoked by the FDA as additional information about the use of the individual medical product becomes better known. None of the aforementioned medical products have received actual “approval” by the FDA.

B. Recent History of Vaccination Mandates & Accompanying Litigation.

84. Three (3) realms of employment have been the primary issue in COVID-19 litigation: (i) employees of federal contractors; (ii) private sector employees; and (iii) government employees and establishments that receive Medicare and Medicaid.

85. First, the U.S. Court of Appeals for the Eleventh Circuit addressed the realm of litigation involving federal contractors. On January, 20, 2021, President Joseph Biden (“Biden”) signed Executive Order 13991 (“EO 13991”), establishing the creation of the “Safe Federal Workforce Task Force” (“Task Force”), whose stated mission is to “provide ongoing guidance to heads of agencies on the operation of the Federal Government, the safety of its employees, and the continuity of Government functions during the COVID-19 pandemic.”⁸ On September 9, 2021, Biden signed Executive Order 14042 (“EO 14042”),⁹ to

⁷ On August 23, 2021, the FDA issued EUA for the Pfizer vaccine, Comirnaty, for individuals sixteen (16) years of age and older. On January 31, 2022, the FDA announced the EUA of Moderna’s COVID-19 vaccine that is marketed as Spikevax. At this time, Johnson & Johnson’s COVID-19 vaccine has yet to be FDA approved for anything other than EUA.

⁸ 86 Fed. Reg. 7,045-48 (Jan. 20, 2021).

⁹ 86 Fed. Reg. 50,985-88 (Sept. 9, 2021).

“promote[] economy and efficiency in Federal procurement by ensuring that the parties that contract with the Federal Government provide adequate COVID-19 safeguards to their workers performing on or in connection with a Federal Government contract or contract-like instrument,” which would “decrease worker absence, reduce labor costs, and improve the efficiency of contractors and subcontractors at sites where they are performing work for the Federal Government.”¹⁰ On December 9, 2021, a Georgia federal district court judge issued a preliminary nationwide injunction that halted enforcement of EO 14042 in the case, *Georgia v. Biden*.¹¹ The scope of this injunction was applicable to all federal contractors and subcontractors in all covered contracts in any state or territory of the U.S. The Eleventh Circuit Court of Appeals subsequently held that the injunction should be narrowed to specific states, to a specific industry group, and in the narrow situation of deciding whether to grant a contract to those specific members or to other contract bidders.¹²

86. Second, the U.S. Supreme Court tackled the issue of vaccine mandates on private sector employees on January 13, 2022, in the case, *NFIB v. OSHA*.¹³ On September 9, 2021, Biden announced “a new plan to require more Americans to be vaccinated.” This would be achieved by the Department of Labor issuing an emergency rule (OSHA’s COVID-19 Emergency Temporary Standard (ETS)) requiring all employers with at least 100 employees to be vaccinated or show a negative test once a week.¹⁴ The- declared purpose of the mandate was to increase vaccination rates at “businesses all across America,”¹⁵ forcing eighty-four (84)

¹⁰ *Id.*

¹¹ *Georgia v. Biden*, 574 F.Supp.3d 1337 (S.D. Ga. 2021).

¹² *Georgia v. President of the U.S.*, 46 F.4th 1283 (11th Cir. 2022).

¹³ *Nat’l Fed’n of Indep. Bus. v. Dep’t. of Lab., Occupational Safety & Health Admin.*, 142 S.Ct. 661 (2022).

¹⁴ *Id.* at 663.

¹⁵ *Id.* (quoting Remarks on the COVID-19 Response and National Vaccination efforts, 2021 Daily Comp. of Pres. Doc. 775, p.2).

million Americans to submit to the medical products. Unvaccinated employees who did not comply with OSHA's rule would be "removed from the workplace." The rule allowed for individuals to submit religious or medical accommodation requests in accordance with the requirements of Title VII¹⁶ of the Civil Rights Act of 1964, which prohibits employment discrimination based on race, color, religion, sex, and national origin. The U.S. Supreme Court described the rule as, "a significant encroachment into the lives – and health – of a vast number of employees" and ultimately struck down the ETS on January 13, 2022.¹⁷

87. Third, the U.S. Supreme Court on January 13, 2022, simultaneously addressed the realm of healthcare service providers when the Court upheld a regulation issued by the Secretary of Health and Human Services ("HHS") that required facilities that accept Medicare and Medicaid funding to require their employees to be vaccinated.¹⁸ However, the Court held that a facility must still recognize an individual's religious and medical accommodation/ exemption requests pursuant to the rule, and must comport with the obligations prescribed by Title VII.¹⁹ [Emphasis added]

C. Conflation of Issues and Strict Interpretation of Religion under Title VII.

88. Plaintiffs are of the belief that recent litigation efforts to redress unlawful business practices have been to no avail because business entities, like Defendants, are able to side-step their obligations under Title VII for two (2) primary reasons. First, Plaintiffs contend that recent litigation surrounding this developing area of the law has been the result of conflating the issues of vaccination mandates with Title VII discrimination analysis. Second, Plaintiffs also contend that there has been too strict of an interpretation given to an

¹⁶ See, Fed. Reg. 61402-551 (Nov. 5, 2021).

¹⁷ *Id.*

¹⁸ *Biden v. Missouri*, 142 S.Ct. 647 (2022).

¹⁹ 86 Fed. Reg. 61571-72.

individual's sincerely held religious beliefs and that Plaintiffs "sincerely held religious beliefs" are synonymous with Title VII's enumerated depiction of the word "religion."²⁰

89. In addressing the first issue, one of the purposes of this complaint is to seek applicable redress afforded to Plaintiffs pursuant to Title VII, which prohibits the unlawful employment practices undertaken by Defendants.²¹ While this suit also seeks to challenge the constitutionality of the Defendants' vaccine mandate, as applied, differentiation between these claims is necessary when conducting Title VII analysis.

90. In addressing the second issue, Plaintiffs contend that there has been too strict of an interpretation of their "sincerely held religious beliefs" and that their religious beliefs are to be considered synonymous with the Title VII's specific statement affording protections based on "religion." Under Title VII, religion is defined broadly to include all aspects of an individual's belief, observance, and practice.²² Furthermore, this broad definition has been incorporated by the U.S. Equal Employment Opportunity Commission ("EEOC") in promulgation of regulations pertaining to religious discrimination.

91. Plaintiffs sincerely held religious beliefs are congruent with Title VII's depiction of religion, U.S. Supreme Court precedent, applicable regulations pertaining to religion, and with EEOC guidance.

²⁰ Title VII of the Civil Rights Act of 1964 provides in pertinent part:

- (a) It shall be an unlawful employment practice for an employer-
- (1) to fail or refuse to hire or to discharge any individual, or otherwise to discriminate against any individual with respect to his compensation, terms, conditions, or privileges of employment, because of such individual's...religion...; or
 - (2) to limit, segregate, or classify his employees or applicants for employment in a way which would deprive or tend to deprive any individual of employment opportunities or adversely affect his status as an employee, because of such individual's...religion.

42 U.S.C. § 2000e-(2)(a)(1) and (2) (emphasis added)

²¹See, 42 U.S.C. § 2000e et seq.

²² 42 U.S.C. § 2000e(j).

D. Plaintiffs Possess Sincerely Held Religious Beliefs Recognized by Law.

92. Plaintiffs' possess sincere held religious beliefs that their body is a temple, and that their Creator planned their existence upon their creation. Plaintiffs should not be compelled to be inoculated with any experimental foreign substance or biological/medical material that violates their religious convictions and will alter the biological aspects of their human body.

93. Plaintiffs' sincere religious beliefs are commonly shared by millions of people around the world.

94. Plaintiffs religious beliefs are not based upon social, political, economic, or personal philosophies.

95. Plaintiffs' religious beliefs are founded by the teachings of a globally accepted monotheistic religion that espouses moral or theistic beliefs as to what is right and wrong and concerns ultimate ideas about an individual's life, purpose, and death.

96. Moreover, Plaintiffs contend that it is instrumental to note that the current three (3) commercialized 'vaccines' are not "vaccines" by any traditional definition; rather, these vaccines are gene-altering experimental therapies. Plaintiffs contend that the introduction of mRNA into their body, or gene therapy, which contains a body-foreign biological/medical substance that delivers metaphorical instructions that alter cell behavior and design, is incongruent with their deeply held religious beliefs that their body is a temple and that their Creator planned their existence and biological design before birth. Further, the introduction of gene therapy medical products cause a fundamental change in the genetic design that their Creator imparted within them. This differentiation illustrates a fundamental difference between-traditional vaccines, such as chicken pox or the measles, and the three commercialized COVID-19 'vaccines'.

- ii. Consequential damages or the maximum permitted by law as determined by the jury (up to \$30,000,000 per Plaintiff);
- iii. Incidental damages or the maximum permitted by law as determined by the jury;
- iv. Punitive damages permitted by law as determined by the jury but in no event less than \$30,000,000,000;
- v. An award of attorneys' fees and costs associated with this action;
- vi. Reinstatement and/or compensatory damages for all employees who retired early or separated in lieu of dismissal, as a result of the United's vaccine mandate;
- vii. An award of prejudgment and post-judgment interest at the legal rate to the maximum extent permitted by law; and
- viii. Such other and further relief as the Court may deem just and proper.

Dated: January 19, 2023

Respectfully submitted,

John Pierce Law, P.C.

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